

## OGC Has Reviewed

16 August 1973

MEMORANDUM FOR: Deputy Director for Management  
and Services

SUBJECT: Conflicts of Interest

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1. The question of reporting personal financial interests in connection with possible conflicts of interest is covered in [REDACTED] in the light of the provisions of Executive Order 11222 and Civil Service Commission regulations of June 9, 1967. The regulation was developed shortly after the Executive Order and was revised in July 1970 to tighten it up a bit.

2. The requirement as to who shall report appears to me to be reasonable, as is the coverage of what shall be reported. There may be a question as to whether there is adequate provision for review by this office. In looking back over our files we find only two cases arising out of this regulation on which we have given opinions (this is aside from some cases arising out of cover situations for DDO nonofficial cover personnel). Your comments lead me to believe that there are more cases which should have come to our attention.

3. You will note that it is up to the Deputy Director, Operating Official, or Head of Independent Office to comment on whether the duties of the employee involve the organizations, persons, or real property in which the employee has a financial

interest or an employment relationship. If the comment is affirmative, the statement and comment will be forwarded to the General Counsel. I do not know how thoroughly this review is done or even how many of the office officials concerned are familiar with the regulatory requirement.

4. If the regulation is considered adequate, it may be that we have an educational process to carry out here. Please let me know if you want any action from this office.

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LAWRENCE R. HOUSTON  
Office of General Counsel

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